



GROUNDWORK WEST MIDLANDS MODERN SLAVERY POLICY

Date of last review: | May 2025 |

1. POLICY STATEMENT

Groundwork West Midlands is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking. As an equal-opportunities employer, Groundwork West Midlands is committed to creating and ensuring a non-discriminatory and respectful working environment for its staff. Groundwork West Midlands wants all its staff to feel confident that they can expose wrongdoing without any risk to themselves.

Modern slavery is a crime and a violation of fundamental human rights. All types of modern slavery have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We are committed to acting ethically and with integrity in all our business dealings and relationships and to ensure modern slavery is not taking place anywhere in our own business, or in any of our supply chains.

Groundwork West Midlands recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion once in our employment.

Groundwork West Midlands does not enter into business with any organisation, in the United Kingdom or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

Groundwork West Midlands is committed to ensuring that its staff and any workers it supplies (directly or indirectly) are not subject to behaviour or threats that may amount to modern slavery, human trafficking, forced labour, and or similar human rights abuses.

We are also committed to ensuring our approach to tackling modern slavery in our own organisation and throughout our supply chains is consistent with our disclosure obligations under the Modern Slavery Act 2015. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain.

This policy sets out the actions we will take to understand all potential modern slavery risks related to the organisation and to ensure steps are maintained to prevent both slavery and human trafficking. Along with our Anti-Bribery and Whistle-blowing policies, it reflects our commitment to acting ethically and with integrity in all our business relationships.

Groundwork's Safeguarding Policy acknowledges modern slavery as a form of abuse and, where there is a concern about a child (under 18 years) or an adult (18 or over) who needs care and support, this Policy takes effect.

In order to assess the risk of modern slavery, we use the following processes.

- We identify and assess potential risk areas when considering taking on new suppliers and regularly review our existing supply chains.
- We review the potential for risk at regular intervals, including the possibility of re-auditing a supplier or conducting spot checks.
- As a pre-condition to supplying Groundwork, suppliers must confirm their compliance with the Act. If a supplier fails to provide the information requested or meet our expectations, we will take appropriate action, which may include not entering into a relationship or terminating an existing one.
- We will protect whistle blowers.

We consider the risk of encountering modern slavery, forced labour, or human trafficking in our supply chain to be low. However, we continue to be alert to the potential for problems.

To maintain awareness and ensure a high level of understanding of the risks of modern slavery and human trafficking, this policy is referenced in our Staff Handbook and incorporated in our induction programme.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment, and we may amend it at any time.

2. RESPONSIBILITIES

The senior management of the organisation has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all of our people comply with it.

The Head of Finance & Office Manager have primary and day-to-day responsibility for implementing this policy, but those in other roles involved in procurement should assist with reviewing the risk profile of our supply chain to ensure that any procedures implemented are effective in countering modern slavery.

3. COMPLIANCE

All employees must ensure that they read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager, the Head of Finance or Office Manager, as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future. You are encouraged to raise concerns about any issue of suspicion of modern slavery in any parts of our organisation or the supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your manager/Head of Finance or Office Manager or report it in accordance with our Whistleblowing Policy as soon as possible.

Groundwork West Midlands encourages openness and will support anyone who raises genuine concerns in good faith in accordance with the organisation's whistleblowing policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their knowledge, or suspicion, that modern slavery is taking place in any part of our organisation or in any of our supply chains.

4. COMMUNICATION AND AWARENESS

Our zero-tolerance approach to modern slavery is communicated to all significant suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our organisation, we provide training to relevant members of staff.

5. BREACHES

Any employee who breaches this policy could be subject disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

6. ONLINE RESOURCES

[Spotting the signs - Gangmasters & Labour Abuse Authority](#)
[Horse trading - Gangmasters & Labour Abuse Authority](#)